U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, New York 11201

July 25, 2023

By ECF
Honorable Nina R. Morrison
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States of America v. Rare Breed Triggers, LLC, et al.*
       <u>No. 23-cv-369 (Morrison, J.) (Levy, M.J.)</u>

Dear Judge Morrison:

The United States respectfully notifies the Court that it has amended the Witness List filed on July 20, 2023 in two ways. *See* ECF No. 91. As an initial matter, the United States no longer intends to call Dean Conigliaro, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), as a witness, and as such has removed ATF Special Agent Conigliaro from its Witness List.

The United States also seeks leave of Court to add Jonathan Robinson, the former General Manager of 3rd Gen Machine, Inc., as an additional witness. The United States respectfully submits that this amendment is on good cause shown, as this Office was not informed that Mr. Robinson would be willing to sign a declaration until earlier this evening, and accordingly did not include him on the Witness List filed last Thursday. The United States has provided a brief narrative statement of Mr. Robinson's declaration in the Witness List attached to this email, and has also filed the Declaration of Jonathan Robinson under a separate docket entry.

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The United States thanks the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE
United States Attorney

By: _____/s/_____
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cc: **By ECF**
All counsel of record